

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 11 CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

**AMENDED NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
BRIAN J. FLYNN, M.D. FOR WAVE 11**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion and memorandum filed in relation to Brian J. Flynn for Ethicon Wave 3, Dkt. 2854 (motion), 2855 (memorandum in support); and the reply briefs filed in Wave 1 (Dkt. 2280) and Wave 3 (3048). Plaintiffs respectfully request that the Court exclude Brian J. Flynn's testimony, for the reasons expressed in the Wave 1 and 3 briefing. This notice applies to the following Wave 11 cases identified in Exhibit A attached hereto.

Dated: August 7, 2019

Respectfully submitted,

/s/ D. Renee Baggett
Renee Baggett, Esq.
Bryan F. Aylstock, Esq.
Aylstock, Witkin, Kreis and Overholtz, PLC
17 East Main Street, Suite 200
Pensacola, Florida 32563
(850) 202-1010
(850) 916-7449 (fax)
E-mail: rbaggett@awkolaw.com

/s/ Thomas P. Cartmell
THOMAS P. CARTMELL
Wagstaff & Cartmell LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
816-701-1102
Fax 816-531-2372
tcartmell@wcllp.com

EXHIBIT A

Bailey, Diane Michelle	2:14-cv-03875
Conteras, Lucia & Conrado	2:13-cv-09194
Crissman, Andrea & Randall	2:13-cv-01319
Davis, Brenda J.	2:14-cv-14777
Freitas, Monica	2:12-cv-01146
Hass, Joni & Steven	2:15-cv-09562
Howard, Jamie Michelle	2:14-cv-07903
Huish, Roxanne Lee	2:13-cv-21784
Martin, Kayleen	2:13-cv-18148
Munsee, Lanell & Blain	2:13-cv-26868
Shostrom, Leah R.	2:13-cv-15857
Smith, Barbara	2:12-cv-04791

CERTIFICATE OF SERVICE

I hereby certify that on August 7, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett
D. RENEE BAGGETT
Aylstock, Witkin, Kreis and Overholtz, PLC
17 E. Main Street, Suite 200
Pensacola, FL 32563
850-202-1010
850-916-7449
Rbaggett@awkolaw.com